

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

7:19-cv-11469 (CS)

Jennifer Lopez-Barnett, individually  
and on behalf of all others similarly  
situated,

Plaintiff,

vs.

Trader Joe's Company,

Defendant.

**STIPULATION AND  
~~PROPOSED~~ ORDER  
FURTHER EXTENDING TIME  
TO RESPOND TO  
COMPLAINT**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that the time within which Defendant Trader Joe's Company may move, answer, or otherwise respond to the Complaint is hereby extended by 28 days, up to and including July 2, 2020.

This is the second request for an extension of time in connection with this matter. The original deadline to respond to the Complaint was May 5, 2020. The parties' first request for an extension was granted on April 29, 2020 (Dkt. 8).

The parties request additional time to consider how to proceed, such as a motion to dismiss or answer by Defendant, an amended complaint by Plaintiff, or a resolution between the parties. This request does not affect any other scheduled dates.

No provision of this Stipulation and Order shall be construed as a waiver of, and Defendant Trader Joe's Company expressly reserves, any and all defenses.

Dated: June 1, 2020

SHEEHAN & ASSOCIATES, P.C.

s/Spencer Sheehan

Spencer Sheehan  
505 Northern Blvd  
Suite 311  
Great Neck, NY 11021  
Office: (516) 303-0552  
Mobile: (516) 236-6456  
Facsimile: (516) 234-7800  
[spencer@spencersheehan.com](mailto:spencer@spencersheehan.com)

*Attorney for Plaintiff Jennifer Lopez-  
Barnett*

Dated: June 1, 2020

FAEGRE DRINKER BIDDLE & REATH LLP

s/Rory F. Collins

Lucas B. Michelen  
1177 Avenue of the Americas,  
41<sup>st</sup> Floor  
New York, NY 10036  
Telephone: (212) 248-3140  
Fax: (212) 248-3141  
[lucas.michelen@FaegreDrinker.com](mailto:lucas.michelen@FaegreDrinker.com)

Sarah L. Brew (*pro hac vice*)  
Tyler A. Young (*pro hac vice application  
forthcoming*)  
Rory F. Collins (NY Bar. No. 5549670)  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402-3901  
Telephone: (612) 766-7000  
Fax: (612) 766-1600  
[sarah.brew@FaegreDrinker.com](mailto:sarah.brew@FaegreDrinker.com)  
[tyler.young@FaegreDrinker.com](mailto:tyler.young@FaegreDrinker.com)  
[rory.collins@FaegreDrinker.com](mailto:rory.collins@FaegreDrinker.com)

*Attorneys for Defendant Trader Joe's  
Company*

SO ORDERED.

Cathy Seibel 6/1/20  
CATHY SEIBEL, U.S.D.J.